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October 25, 1994

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

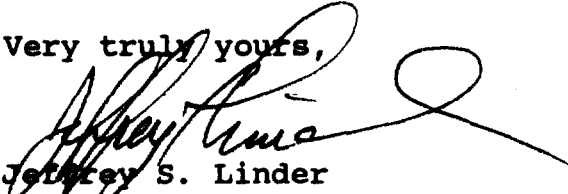
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Re: Ex Parte Contact in Docket No. 94-1

Dear Mr. Caton:

This is to inform you that Scoop Sairanen, Vice President-Regulatory of TCA, R. Michael Senkowski and I met separately with Karen Brinkman of Chairman Hundt's office; James Coltharp of Commissioner Barrett's office; Richard Welch of Commissioner Chang's office; and Jim Casserly of Commissioner Ness' office to discuss matters contained in the attached handout.

Very truly yours,


Jeffrey S. Linder

JSL:rw

cc: Karen Brinkman
James Coltharp
Richard Welch
Jim Casserly

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Tele-Communications Association

OCT 25 1994

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FCC POLICIES CAN PROTECT SERVICE QUALITY

Background

- The FCC's service quality monitoring program has improved markedly since 1990 -- particularly by recognizing the benefits of "benchmarking"
- TCA's Service Quality Survey shows overall satisfaction with service quality, but also reveals certain danger signs:
 - increases in held orders
 - decreased expertise of service personnel
 - inadequate response to trouble reports and outages
 - significant disparities in service levels and availability between urban and rural areas
- Continued attention to service quality is needed because of LEC layoffs -- at least 35,000 since 1990, with 63,000 more announced by 1997

Service Quality Monitoring Should Be Enhanced in Two Respects

- **Geographic differences**
 - 41 percent of U S West respondents and 25 percent of Pacific Bell respondents cited major disparities between urban and rural areas -- disparities that are masked by the current level of aggregation
 - The uneven development of competition likely will increase disparities between urban and rural areas

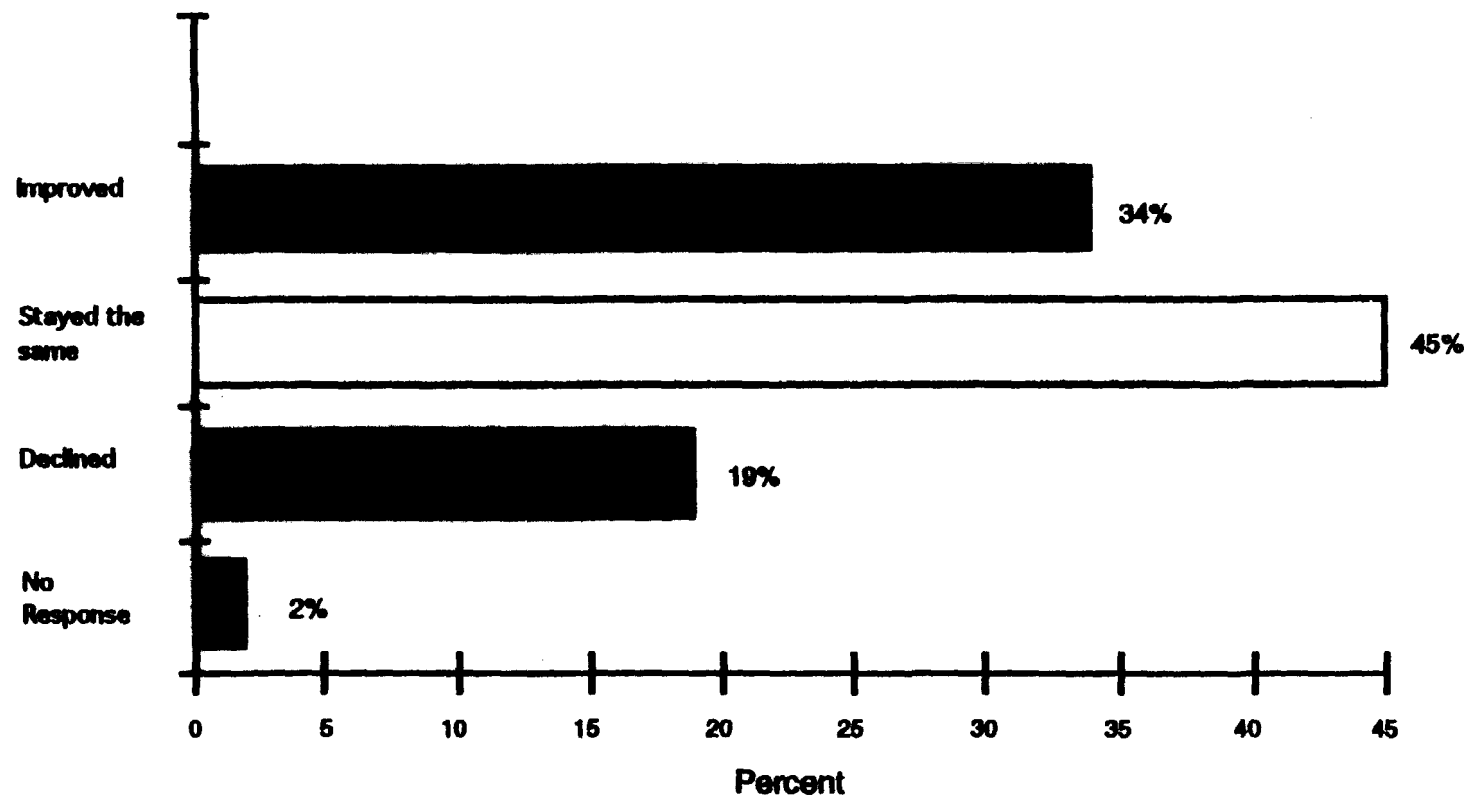
- LECs should provide exception reporting of wire centers that fall within the lowest ten percent in actual performance in any key parameter for three consecutive quarters
- LECs should report any MSA or non-MSA that is in the lowest quartile in deployment of key NII-related technologies (as supported by Pacific Bell), and if any area is listed for four consecutive quarters, the LEC should disclose its plans for deploying more modern technology.
- Data transmission quality
 - Data accounts for 14 percent of all traffic and is growing rapidly
 - High quality data transmission is important for all users -- not just big business
 - High quality data transmission is essential for many NII-related applications, including digital libraries, telemedicine, and electronic document interchange
 - Non-intrusive means exist for measuring availability, errored seconds, and severely errored seconds

Service Quality Monitoring Is Critical During the Transition to Competition

- As noted above, the uneven development of competition will exacerbate existing disparities
- Competition will spur additional lay-offs and cost-cutting
- Availability of comparative information on performance enhances the benefits of competition

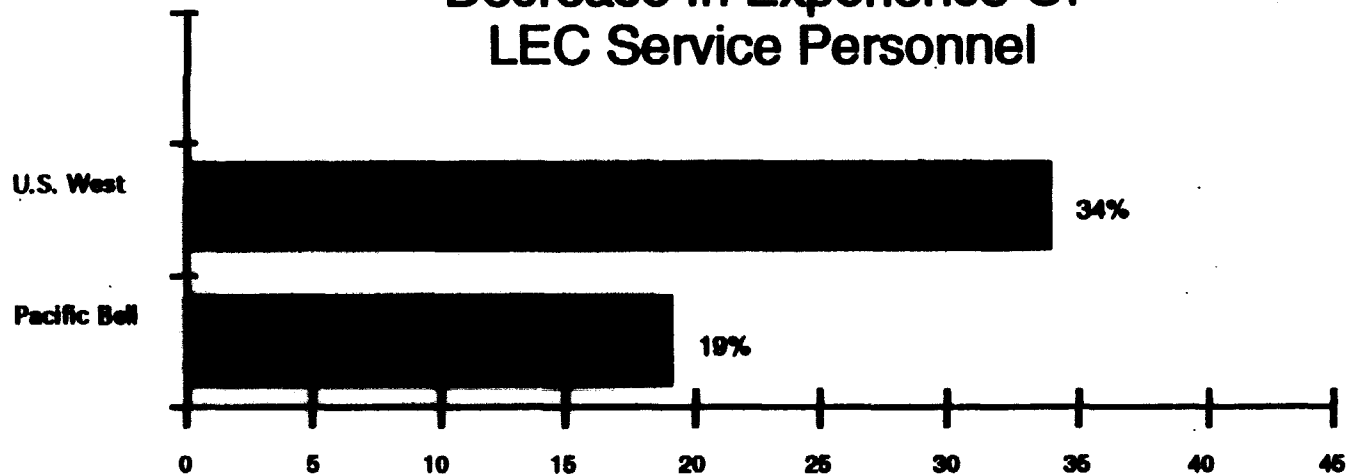
KEY FINDINGS FROM TCA SERVICE QUALITY SURVEY (144 QUALIFIED RESPONDENTS)

Overall Service Quality (1994 vs. 1990)

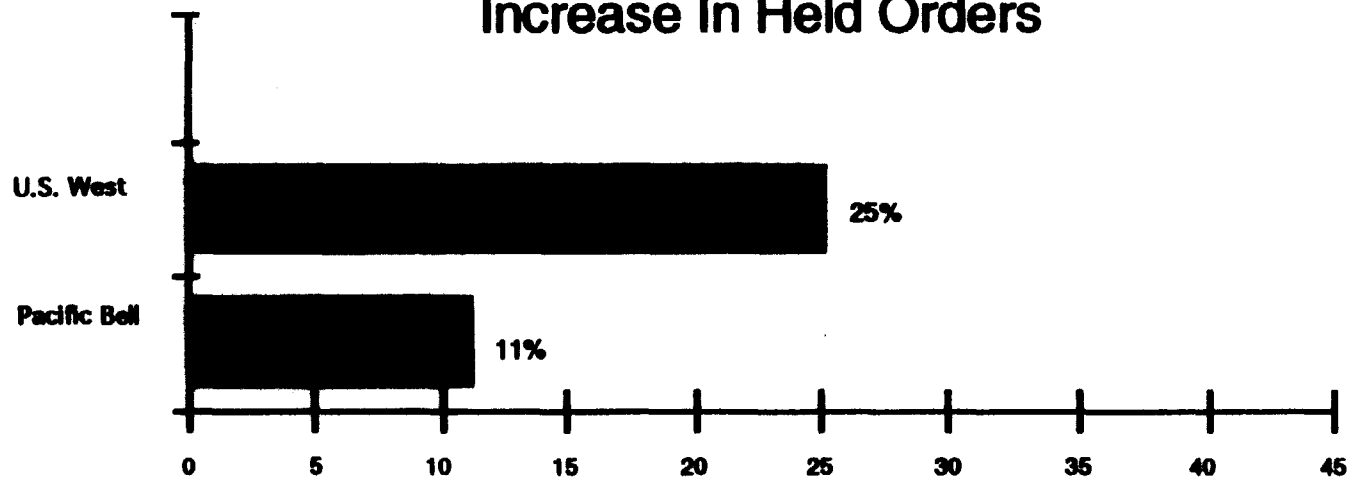


DANGER SIGNALS

Decrease In Experience Of LEC Service Personnel

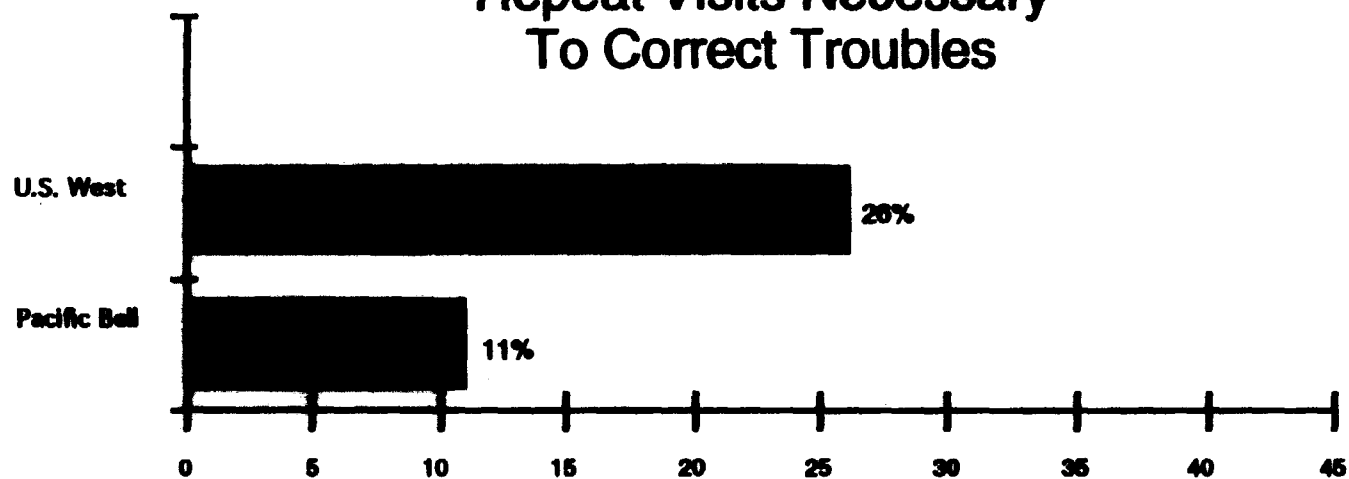


Increase In Held Orders

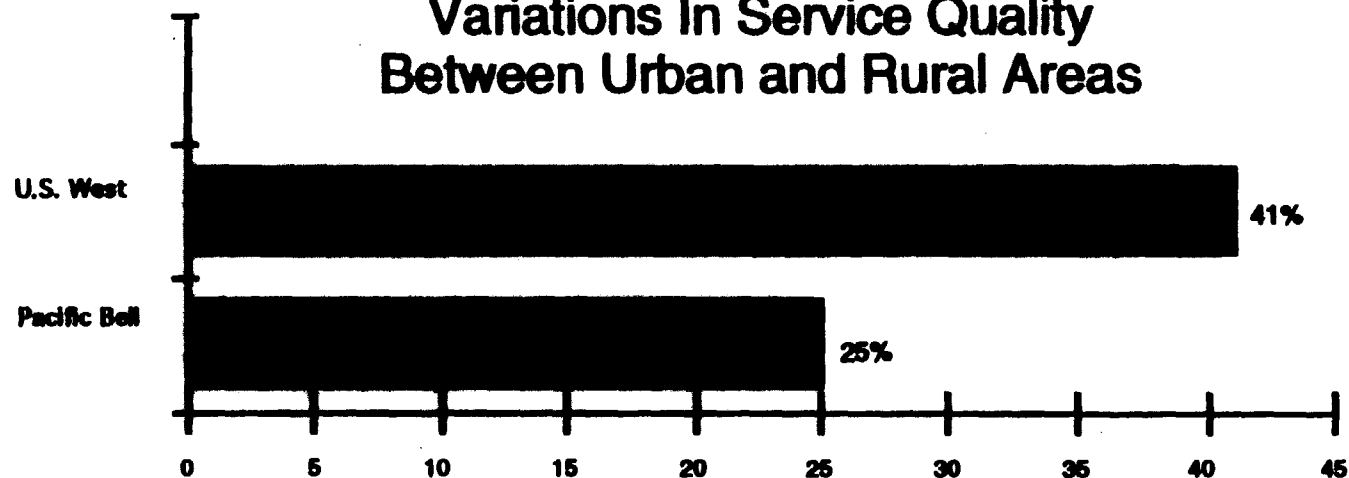


DANGER SIGNALS

Repeat Visits Necessary To Correct Troubles



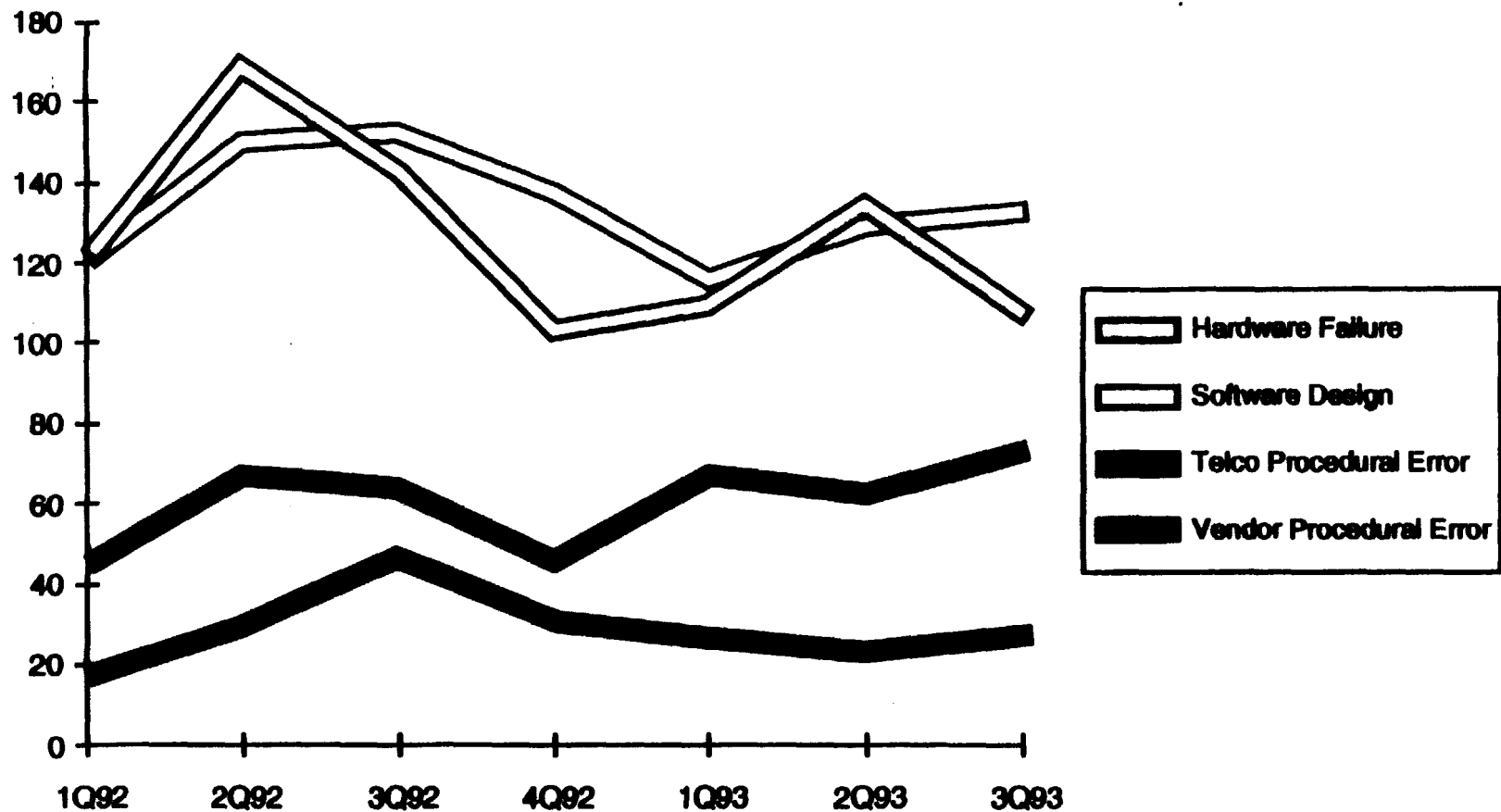
Variations In Service Quality Between Urban and Rural Areas



RBOC EMPLOYMENT

Carrier	Layoffs Since 1990	Planned Layoffs 1994-1997
Ameritech	4,800	10,000
Bell Atlantic	6,000	0
BellSouth	4,250	10,200
NYNEX	1,900	22,000
Pacific Bell	14,000	10,000
Southwestern Bell	3,860	1,500
U S West	0	9,000
Total:	34,810	62,700

PREDOMINANT CAUSES OF UNSCHEDULED LOCAL SWITCH DOWNTIME



LEC EXPERIENCE WITH LOCAL SWITCH OUTAGES

A. Events/Million Access Lines (Ranked from fewest to most)

1st Quarter 93

Pacific Telesis (0.41)
Bell Atlantic
U S West
NYNEX
Ameritech
SW Bell
GTE
BellSouth
Contel
United (14.47)

2nd Quarter 93

Bell Atlantic (0.94)
Pacific Telesis
NYNEX
Ameritech
SW Bell
BellSouth
U S West
GTE
United
Contel (18.25)

3rd Quarter 93

Pacific Telesis (0.55)
Bell Atlantic
U S West
Ameritech
NYNEX
SW Bell
BellSouth
GTE
United
Contel (25.86)

LEC EXPERIENCE WITH LOCAL SWITCH OUTAGES

B. Average Duration (Ranked from shortest to longest)

1st Quarter 93

Pacific Telesis
BellSouth
Bell Atlantic
SW Bell
Ameritech
U S West
NYNEX
United
GTE
Contel

2nd Quarter 93

Pacific Telesis
Bell Atlantic
Ameritech
BellSouth
SW Bell
GTE
NYNEX
United
Contel
U S West

3rd Quarter 93

BellSouth
Bell Atlantic
Ameritech
SW Bell
NYNEX
GTE
U S West
Contel
United
Pacific Telesis